

# **Exhibit A**

**From:** Helen Chaitman  
**To:** [Hunt, Dean D.](#)  
**Cc:** [Cremona, Nicholas J.](#)  
**Subject:** RE: Nelson Trial Dates  
**Date:** Monday, November 12, 2018 1:57:36 PM

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I cannot agree.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

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**From:** Hunt, Dean D. [mailto:[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)]  
**Sent:** Monday, November 12, 2018 2:38 PM  
**To:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** Nelson Trial Dates

Helen –

The Court and the Trustee already provided a several month accommodation to allow for medical procedures etc. Our proposal would minimize the disruption to your clients and is in the best interest of judicial economy. It is entirely reasonable to try to accomplish both in May. Since the issues and parties overlap in almost all respects, we believe (and we believe the Court would concur) that the trials should be consolidated. Again, we propose May 8-10 for both cases. If it spills over to a fourth day, I am sure the Court could accommodate us.

Please let us know if you agree. If not we will seek a third pretrial/status conference to get the matter scheduled in a reasonable time.

Thanks,

**Dean Hunt**  
Partner



811 Main Street | Suite 1100  
Houston, TX 77002-6111  
T +1.713.646.1346

[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)  
[bakerlaw.com](http://bakerlaw.com)



**From:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Sent:** Monday, November 5, 2018 3:53 PM  
**To:** Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** RE: Nelson Trial Dates

There is nothing in the transcript which suggests that the Judge intended to subject the Nelsons, who are in the 80's, to two trials in one month. I will check their availability for June. Are there days that don't work for you in June?

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

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**From:** Hunt, Dean D. [<mailto:dhunt@bakerlaw.com>]  
**Sent:** Monday, November 05, 2018 3:05 PM  
**To:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** RE: Nelson Trial Dates

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**From:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Sent:** Monday, November 5, 2018 12:31 PM  
**To:** Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** RE: Nelson Trial Dates

I don't have the transcript. Can you email it to me?

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

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**From:** Hunt, Dean D. [<mailto:dhunt@bakerlaw.com>]  
**Sent:** Monday, November 05, 2018 12:06 PM  
**To:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** Re: Nelson Trial Dates

It was the last thing he said as the hearing ended.

Sent from my iPhone

On Nov 2, 2018, at 8:04 PM, Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)> wrote:

Show me where he said that in the transcript.

Sent from my iPhone

On Nov 2, 2018, at 4:52 PM, Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)> wrote:

The Judge directed us to submit dates in May.

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**From:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Sent:** Friday, November 2, 2018 3:48 PM  
**To:** Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** RE: Nelson Trial Dates

I don't want to do two trials in the same month. I will ask about June.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

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**From:** Hunt, Dean D. [<mailto:dhunt@bakerlaw.com>]  
**Sent:** Friday, November 02, 2018 4:48 PM  
**To:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** RE: Nelson Trial Dates

What May dates work for the other case?

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**From:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Sent:** Friday, November 2, 2018 3:03 PM  
**To:** Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** RE: Nelson Trial Dates

See the email below I sent on 10/28.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

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**From:** Helen Chaitman  
**Sent:** Sunday, October 28, 2018 3:56 PM  
**To:** Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** RE: Nelson Trial Dates

We can do *Picard v. Carol Nelson* on May 8 – 10. This is index number 10-04658.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

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**From:** Hunt, Dean D. [<mailto:dhunt@bakerlaw.com>]  
**Sent:** Friday, October 26, 2018 10:24 AM  
**To:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** Re: Nelson Trial Dates

Please let us know on those dates.

Sent from my iPhone

On Oct 24, 2018, at 11:39 AM, Helen Chaitman  
<[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)> wrote:

The testimony in each case will be different. I don't think the cases can be tried together. I will check with Mr. Nelson to see if he can go forward on those dates.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022

[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)

Cell: (908) 303-4568

Fax: (888) 759-1114

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**From:** Hunt, Dean D. [<mailto:dhunt@bakerlaw.com>]  
**Sent:** Wednesday, October 24, 2018 10:53 AM  
**To:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>  
**Subject:** Nelson Trial Dates

Helen –

Because a majority of the testimony will be duplicative in these cases, we would like to schedule both cases to be tried from May 8 through 10. Please let us know if those dates work for you.

Thanks,

**Dean Hunt**  
Partner

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<image002.jpg>  
811 Main Street | Suite 1100  
Houston, TX 77002-6111  
T +1.713.646.1346

[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)  
[bakerlaw.com](http://bakerlaw.com)  
<image004.jpg><image006.jpg>

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